



Piedmont  
Natural Gas  
Company

Post Office Box 33066  
Charlotte, North Carolina 26233

ORIGINAL

DEPARTMENT OF TRANSPORTATION

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DOCKET SECTION

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March 22, 1999

Dockets Facility  
US Department of Transportation  
Plaza 401  
400 Seventh Street, SW  
Washington, DC 20590

RE: Docket RSPA-98-4957; Notice 1  
Notice of Request for Extension of Existing Information Collection

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## Introduction

Piedmont Natural Gas Company, Inc., the second-largest gas utility company in the Southeast, is an energy and services company primarily engaged in the transportation and sale of natural gas to over 625,000 residential, commercial and industrial customers in North Carolina, South Carolina and Tennessee. The Company and its non-utility subsidiaries are also engaged in acquiring, marketing and arranging for the transportation and storage of natural gas to large volume purchasers and the sale of propane to over 48,000 customers in the Company's three-state area.

## General Comments

### Issue (a)

The proposed collection of information is not needed for the proper performance of the functions of the agency. There is an inherent difference between the terms "record" and "evidence". In Amendment 192-74, RSPA recognized that evidence "need not be customer-specific." The requirement for a record is clearly more specific than what is needed to demonstrate evidence of compliance. The proposed requirement for records of information is ambiguous and confusing.

Further in the pipeline safety regulation 49 CFR 190.203, RSPA provides for compliance inspection and includes methods for obtaining sufficient information to assure compliance. Therefore, the any specific requirement for records or evidence associated with customer notification is redundant and not necessary.

**Issue (b)**

The estimated annual burden of 5.7 hours per respondent is significantly understated. By comparison, similar records are specified for customer notification of the availability of excess flow valves (192.383). For excess flow valves, RSPA estimates an annual burden per respondent of 5 1.8 hours. While the details of the differences are not clear, the estimate of more than 50 hour is more accurate.

**Issue (c)**

No comment.

**Issue (d)**

No comment.

Sincerely,



Ronald W. Cobb

Manager Materials Management and Design